

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)	
)	
Empowering Parents and Protecting Children)	MB Docket No. 09-194
in an Evolving Media Landscape)	
)	

COMMENTS OF COMCAST CORPORATION

Comcast Corporation (“Comcast”) hereby responds to the above-captioned Notice of Inquiry (“*Notice*”).¹ Comcast welcomes this opportunity to discuss further how it empowers parents to determine what content is appropriate for their children and control what their children see by providing a wide-range of parental control options. Because many of the issues raised in the *Notice* are similar to those in the Commission’s Child Safe Viewing Act Notice of Inquiry (“*CSVA Notice*”),² Comcast’s detailed comments and reply comments in response to that notice are highly relevant in this proceeding and are attached hereto.³ We briefly summarize below the highlights of those pleadings. In addition, we detail the additional efforts Comcast has taken since filing those pleadings to improve its parental control technologies, helping parents choose what, when, and how their children can access both television and online content.

¹ *In re Empowering Parents and Protecting Children in an Evolving Medial Landscape*, Notice of Inquiry, 24 FCC Rcd. 13171 (2009) (“*Notice*”).

² *In re Implementation of the Child Safe Viewing Act; Examination of Parental Control Technologies for Video or Audio Programming*, Notice of Inquiry, 24 FCC Rcd. 3342 (2009) (“*CSVA Notice*”).

³ Comcast Comments, MB Docket No. 09-26 (Apr. 16, 2009) (“Comcast CSVA Comments”); Comcast Reply Comments, MB Docket No. 09-26 (May 18, 2009) (“Comcast CSVA Reply Comments”). Comcast’s comments and reply comments are attached hereto in Exhibit 1.

I. AS THE CHILD SAFE VIEWING ACT RECORD SHOWS, COMCAST PROVIDES MYRIAD OPTIONS TO EMPOWER AND EDUCATE PARENTS.

In response to consumer demand, today's marketplace is producing an abundance of parental control technologies. Cable operators, direct broadcast satellite providers, telephone companies, and consumer electronics manufacturers have responded to their customers' demands by developing a wide variety of blocking and other advanced control technologies that empower parents and protect children. In the comments and reply comments filed in response to the *CSVA Notice*, Comcast and other multichannel video programming distributors ("MVPDs") described both the prevalence and success of MVPD-provided parental control technologies, which the Commission then praised in its Child Safe Viewing Act Report to Congress ("*CSVA Report*").⁴

The *CSVA Report* noted that surveys have indicated that parents' awareness of their MVPD's parental control tools is high and that a majority of parents find their MVPD's parental control tools to be useful. The Luntz Maslansky Strategic Research and Hart Research survey, for example, estimated that parents' awareness is as high as 90 percent.⁵ The Russell Research Survey found that 66 percent of parents find cable blocking technology useful.⁶ Of particular note, the Commission acknowledged that the "cable industry has voluntarily undertaken specific

⁴ *In re Implementation of the Child Safe Viewing Act; Examination of Parental Control Technologies*, Report, 24 FCC Rcd. 11413 (2009) ("*CSVA Report*").

⁵ *See id.* ¶ 57 (citing the June 2007 Luntz Maslansky Research/Hart Research Survey commissioned by TV Watch).

⁶ *See id.* ¶ 58 (citing the November 2005 Russell Research Survey commissioned by TV Watch). The Russell Research Survey also found "that 63 percent of parents surveyed were familiar with cable parental controls," and that 17 percent of families used such controls. *Id.* ¶57. A Cox study from 2004 found that "60 percent of parents surveyed found that parental controls on cable boxes were the most valuable monitoring tool for television." *Id.* ¶ 58.

actions to promote the availability of parental control tools in cable technology.”⁷ Indeed, the *CSVA Report* paints a clear picture of the cable industry’s success in developing parental control technologies, implementing them in ways that are appealing to and widely adopted by subscribers, and educating parents on how to use effectively parental control tools and features, all without any government mandate.

In its comments and reply comments submitted in response to the *CSVA Notice*, Comcast discussed in detail the parental control technologies it offers to its customers, and the efforts it takes to educate parents about these technologies. Because children can access content that their parents find objectionable both on television and online, Comcast detailed the tools it provides to parents to maintain control over both services. With respect to cable television content, Comcast noted that it will block any channel upon request for no additional charge.⁸ For analog cable subscribers (which are an ever-shrinking minority of Comcast’s customers), a signal trap or set-top box can be used to block objectionable programming. For Comcast digital cable subscribers, the opportunities for advanced control technologies expand; they can block programming by channel, title, or by TV Parental rating, block or limit access to video-on-demand (“VOD”) content or content recorded using digital video recorder (“DVR”) services, and access controls that allow parents to hide show titles from appearing in the electronic program guide (“EPG”).⁹ Comcast also explained that, consistent with the cable industry’s commitment to improve the TV

⁷ See *id.* ¶ 61 (describing the cable industry’s 2004 “Control Your TV” education effort and noting that cable companies, including Comcast, provide assistance to help parents with parental controls via telephone hotlines, websites, and instructional short programs and videos).

⁸ Comcast CSVA Comments at 3-4.

⁹ *Id.*

ratings system, the channels it manages use the larger and more frequent program ratings icons contemplated by NCTA's guidelines.¹⁰

With respect to content children can access online, Comcast highlighted its partnership with McAfee to offer its High-Speed Internet ("HSI") customers controls to filter out content that they deem inappropriate, and to monitor their children's Internet activity to help protect against online predators, identity theft, and exposure to unwanted content.¹¹ Comcast described how McAfee's controls, which Comcast provided to HSI customers at no additional charge, allowed parents to, among other things, establish time limits for when their children may use the Internet; block access to objectionable websites; prevent children from accidentally accessing sites containing objectionable material; limit access to content parents may find objectionable using image analysis, even on sites that may not be blocked; and prevent online posting or release of information parents designate as "private."¹² Additionally, Comcast discussed SafeSearch, a kid-friendly Internet filtering tool that screens search results for sites that contain explicit sexual content and deletes them.¹³

Comcast understands that teaching parents how to use its advanced control technologies goes hand-in-hand with providing the technology. Comcast utilizes a variety of formats to educate parents about tools available to them and promote digital literacy, providing information

¹⁰ *Id.* at 4; *see generally* Press Release, NCTA, *New "Take Control. It's Easy" Public Service Announcements Alert Consumers to Parental Controls* (May 17, 2005), available at <http://www.ncta.com/ReleaseType/MediaRelease/370.aspx>. These channels include PBS KIDS Sprout, G4, E!, Style, TV One, Golf Channel, VERSUS, and the Comcast SportsNets. *Id.*

¹¹ *Id.*

¹² *Id.* at 4-5.

¹³ *Id.* at 5; *see* Comcast Corp., *FAQs, What Is SafeSearch?*, <http://customer.comcast.com/Pages/FAQViewer.aspx?Guid=8704f34c-07d6-4d0c-8a4a-6a6039ba9051> (last visited Feb. 19, 2010).

in new customers' Welcome Kits, over its dedicated telephone hotline, on instructional videos on VOD, and with additional information available online.¹⁴ Comcast also discussed its agreement with Common Sense Media ("CSM") to provide detailed, age-based information about television shows, movies, websites, video games, and books to Comcast subscribers.¹⁵ CSM's reviews of movies and television programs are available on Comcast's VOD service and on Comcast.net.¹⁶ Finally, Comcast noted the importance of its involvement with coalitions such as iKeepSafe, PointSmart.ClickSafe., and the Family Online Safety Institute ("FOSI"),¹⁷ which all provide additional guidance for parents on the use of parental control technologies on television and online.

Overall, commenters in the *CSVA Notice* proceeding largely agreed (and the *CSVA Report* confirmed) that an abundance of parental control tools are available in today's marketplace, that parents are aware of these tools, and that parents are using these tools as part of their overall strategy to manage the content their children access.¹⁸ In light of this success and given the breadth and depth of parental control options available in the marketplace, Comcast explained why government mandates remain unnecessary and could have unintended negative consequences.¹⁹ Industry studies have come to the same conclusion. For example, after

¹⁴ Comcast CSVA Comments at 5-6.

¹⁵ *Id.* at 6.

¹⁶ *Id.* at 7.

¹⁷ *Id.* at 7-8. FOSI is an international, non-profit membership organization dedicated to working to create a safer Internet. *Id.* at 8. Comcast showcased its Internet Safety initiatives at FOSI's conferences in 2007 and 2008, was a leading sponsor of FOSI's 2008 conference, and has participated in numerous FOSI events. *Id.*

¹⁸ Comcast CSVA Reply Comments at 2; *see also* NAB, NCTA, and MPAA Joint Reply Comments, MB Docket No. 09-26, at 3-5 (May 18, 2009); AT&T Comments, MB Docket No. 09-26, at 5 (Apr. 16, 2009); Verizon & Verizon Wireless Comments, MB Docket No. 09-26, at 11 (Apr. 16, 2009).

¹⁹ Comcast CSVA Reply Comments at 5.

reviewing five major online safety task force studies, the Progress & Freedom Foundation concluded that education, empowerment, and industry self-regulation represent the best approach to addressing concerns about online safety.²⁰

II. COMCAST CONTINUES TO IMPROVE PARENTAL CONTROL TECHNOLOGIES AND EDUCATION.

Comcast continues to improve its existing parental controls to make them more innovative and user-friendly, and it does so in the absence of a government mandate. In just the eight months since Comcast last reported to the Commission on this topic, Comcast has made many additional strides in empowering parents, and will continue to do even more.

- *Parental Controls for Online Video Content.* Comcast continues to work to further develop and improve tools for parents to better control what their children can watch online. This past January, we announced a new partnership with Symantec to offer its award-winning Norton Security Suite to all of our HSI customers for no additional charge.²¹ The Norton Security Suite includes robust parental controls, such as filters that allow parents to ensure their children are exposed to age-appropriate website content and monitoring capabilities that provide parents who want to know with information about search terms their kids are using, as well as information about their kids' social networking accounts.

Just a few weeks ago, Comcast implemented controls that allow authenticated customers using the new Fancast Xfinity TV service to set up account “families” consisting of

²⁰ See Adam Thierer, Progress & Freedom Foundation, *Five Online Safety Task Forces Agree: Education, Empowerment & Self Regulation Are the Answer*, 16 Progress on Point, at 16 (July 2009). Mr. Thierer noted that, “if lawmakers enact more regulations aimed at banning certain types of online content, or mandating unworkable solutions like mandatory online age verification, those efforts will be bogged down in the courts for years to come.” *Id.*; see also Berkman Ctr. for Internet & Society, *Enhancing Child Safety and Online Technologies: Final Report of the Internet Safety Technical Task Force* 35 (Dec. 31, 2008) (finding that even an endorsement by state Attorneys General of a particular technological approach would stifle innovation and progress in the area of protecting children online), available at http://www.wiredsafety.org/resources/pdf/2009_isttf_final_report.pdf.

²¹ See Press Release, Comcast Corp., *Comcast Partners with Symantec To Offer Award-Winning Norton Security Suite to Its High-Speed Internet Customers* (Jan. 20, 2010), available at <http://www.comcast.com/About/PressRelease/PressReleaseDetail.aspx?PRID=957>. The new partnership replaces the partnership we had with MacAfee, but provides more and improved security and parental controls to Comcast's HSI customers.

primary and secondary account holders.²² Primary account holders can restrict secondary account holders' access to Fancast Xfinity TV content, either by network or by rating. Users within a particular family account have to enter a four-digit PIN prior to viewing a video that has been restricted on that account. While users who are not authenticated do not have access to parental controls when viewing content, the national Fancast Xfinity TV site, available to any Internet user, now requires users to log in before viewing content more mature than PG-13 or TV-14. In connection with these controls, Comcast uses an opt-in feature contemplated by the Children's Online Privacy Protection Act ("COPPA"), which prompts a primary account holder, during the online parental control set-up, to read and complete a COPPA disclosure and a COPPA consent screen. For each restricted secondary account, a primary account holder must affirmatively consent to the collection and use of personal information for children under 13 years of age. Comcast plans to further develop its controls for online video content throughout 2010. Comcast will continue to explore various ways to allow parents to create a menu of online video content they deem appropriate for their children.

- *Common Sense Media.* Comcast continues to foster its partnership with CSM in order to provide parents with even more information to make educated viewing decisions for their families. Comcast gives CSM content prominent placement in both the "Movies/Trailers & Review" and "Kids" sections of its On Demand menu. Comcast recently launched CSM's "Family Movie Reviews" on its VOD service and began promoting these reviews on the barker channel on On Demand. Additionally, CSM's "411 for Parents" has been renamed "Make Kids Media Safe" and is now double-mapped under the "Kids" and "Life & Home" menu options on On Demand. During 2010, Comcast plans on incorporating CSM content into its Fancast Xfinity TV service and plans to enable parents to link to CSM reviews and ratings through the Fancast Xfinity TV service. Comcast is working with CSM to add reviews for movies available On Demand in addition to reviews for theatrical releases. Comcast's mobile team also is working to enable its iPhone application to incorporate integrated CSM listings from Fancast.

As part of Comcast's public interest commitments in connection with its proposed joint venture with NBC Universal ("NBCU"), Comcast has committed to expanding its partnership with CSM, working creatively to incorporate CSM information on emerging On Demand and On Demand Online platforms, and looking for opportunities for CSM to work with NBCU. Comcast and CSM are currently in talks to broaden their partnership to carry CSM's programming information and parental control tools across distribution

²² Comcast's Fancast Xfinity TV is an innovative service that gives customers subscribing to Comcast's cable service ("authenticated customers") online access to movies and TV shows that have never been available online before, at no additional charge. In addition to the content now available to authenticated customers, Fancast Xfinity TV offers thousands of programming choices that are available to any Internet user, regardless of whether they are a Comcast cable customer. Following Comcast's national beta launch of Fancast Xfinity TV in December 2009, Comcast is moving ahead in 2010 to the next phase of authentication trials to provide authenticated customers with "anytime, anywhere" access to video content, including the ability to access Fancast Xfinity TV content using the network of any Internet service provider or, for a particular content owner's content, from that owner's website.

platforms. Comcast and CSM are also exploring cooperative efforts to develop digital literacy and media education programs so that parents and kids can become smart and safe broadband users. Finally, Comcast has committed to devote millions of dollars in media distribution resources to support public awareness efforts over the next two years to further CSM's digital literacy campaign.

- *Third-Party Ratings for Video Content.* In order to provide parents with even more ratings information, Comcast is exploring the possibility of incorporating additional ratings, such as educational and informational ratings and CSM ratings, into its EPG.
- *Coordination with PBS Kids Sprout.* Comcast coordinated with McAfee and Sprout to develop a blog post for Sprout's "For Parents" website. McAfee's "Online Safety Mom" and Sprout discussed what parents can do to keep their family safe and protected while online. At the FOSI Conference in November 2009, Comcast partnered with Sprout to demonstrate the variety of online parental control tools available to parents with young children.
- *Other Internet Controls.* In October 2009, Comcast unveiled its Constant Guard Internet Security Program designed to protect HSI customers from bots, viruses, and other online threats. The Constant Guard program utilizes a Consumer Security Assurance team, advanced security software, and a security web portal of consumer resources to protect consumers from increasingly sophisticated threats, which is available at www.comcast.net/security. The program likewise provides protection to children, whose email accounts can be spammed by bots with links to objectionable content.
- *Online Monitoring.* Comcast continues to develop ways for parents to monitor and receive reports on their children's Internet usage. As a part of its partnership with Symantec, Comcast HSI customers have access to OnlineFamily.Norton at no additional charge. OnlineFamily.Norton gives parents the ability to monitor where children go, how long they are online, who they talk to, and what information they are sharing with others. The service allows parents the ability to monitor this activity remotely; parents can generate an organized report -- including search activity -- of their children's online activity from any Internet connection. OnlineFamily.Norton also offers unique communication tools for promoting a dialogue between parents and kids about good online habits; for example, children are able to fill out a permission slip request explaining why they feel they should gain access to blocked content.²³
- *KidZui.* Comcast and Kidzui announced a partnership in July 2009 to deliver a safe, fun Internet portal for kids and families to millions of households across the country. Designed for children aged 3-12, KidZui connects kids to games, activities, videos, and educational materials -- all of which has been reviewed by an editorial team of parents and teachers dedicated to providing the best online content for kids. This customized

²³

For a list of features, see <http://onlinefamilyinfo.norton.com/features.php>.

Comcast version of KidZui is available at no additional charge for Comcast HSI subscribers. KidZui is tailored to kids, providing a safe, social community of friends with no open chat. Parents are notified when new friends are made and given the tools to approve or block friendships. Parents can also review their kids' online searches and activities through their KidZui parent account (kidzui.comcast.net).

- *National Educational Efforts.* Comcast recognizes the value of educating users not only about parental control tools but also about children's online safety in general, and Comcast continues to do its part. For example, as part of National Internet Safety Month in June 2009, Comcast and McAfee partnered to call on parents and their children to take the *Cyber Summer Safety Challenge*, designed to start a dialogue about Internet safety and online threats, and what children and teens can do to protect themselves. The *Challenge* included both a kids version and a teen version of online safety issues for parents and their children to talk through. In November 2009, Comcast participated in the FOSI Conference, where Comcast highlighted its ongoing partnerships with iKeepSafe and its various online safety tools. Comcast will continue to take an active role in educating consumers.
- *Regional Educational Efforts.* Comcast's commitment to online safety is also evident from its regional initiatives to educate consumers and policymakers. For example, Comcast's Greater Chicago Region recently participated in Illinois Attorney General Lisa Madigan's Cyber Safety Summit of technology experts, law enforcement, and school leaders. The Summit focused on strategies to protect children from the dangers of cyberspace, and Comcast highlighted the tools it provides families to protect against these dangers. In its partnership with iKeepSafe, Comcast also rolled out state-specific Internet safety "Parent Presentations" in several states, including Florida, Maryland, Michigan, Mississippi, New Hampshire, Texas, Virginia, and Washington, in 2008 and 2009, in coordination with each states' Attorney General. Comcast has coordinated efforts to distribute these Parent Presentations throughout the schools in these states, and continues to host these Presentations On Demand for its customers. Comcast has also sponsored and helped distribute *Faux Paw and the Dangerous Download* in the *Faux Paw* series, a book and DVD series that educates children about the dangers and potential pitfalls online.

Comcast continues to actively develop a wide range of tools to empower parents and protect children. As the media landscape continues to evolve, Comcast understands the importance of giving parents the tools they need to protect their children from content that they find inappropriate, and Comcast is constantly exploring better and more innovative ways to bring these tools to parents.

III. CONCLUSION.

As Comcast demonstrated in response to the *CSVA Notice*, and as evidenced by Comcast's continuing efforts to develop parental controls, consumer demand in today's marketplace incentivizes MVPDs to empower and educate parents. In such a vibrant video marketplace, government mandates for parental control technologies are unnecessary. Comcast will continue to provide its customers with the latest control technologies for its cable and Internet services.

Respectfully submitted,

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EXHIBIT 1

**BEFORE THE
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In the Matter of)	
)	
Implementation of the Child Safe Viewing Act;)	MB Docket No. 09-26
Examination of Parental Control Technologies)	
for Video or Audio Programming)	
)	

COMMENTS OF COMCAST CORPORATION

Comcast Corporation (“Comcast”) hereby responds to the above-captioned Notice of Inquiry (“*Notice*”).¹ Comcast recognizes that not all video programming is appropriate for every age group. That is why, as described in more detail below, Comcast *empowers* parents to determine what content is appropriate for their children by providing its customers with a wide-range of parental control options and *educates* parents about the tools that are available to them. Comcast’s parental controls demonstrate its commitment “to give consumers choice, give parents control, and educate both parents and kids so that they can become smarter, better viewers.”²

I. COMCAST GIVES CONSUMERS CHOICE.

Consumer tastes vary widely. Recognizing that, Comcast provides its customers over 1,000 programming and price combinations that let them choose the mix of services that meets their individual programming interests and household budgets. To the extent parents want to keep certain content they find objectionable from entering their homes, Comcast offers a number

¹ *In re Implementation of the Child Safe Viewing Act; Examination of Parental Control Technologies for Video or Audio Programming*, Notice of Inquiry, 24 FCC Rcd. 3342 (2009) (“*Notice*”).

² D. Cohen & J. Waz, *Controlling the Remote*, Blueprint, Vol. 4, at 50-52 (2005), available at http://www.ndol.org/ndol_ci.cfm?kaid=114&subid=144&contentid=253576.

of programming packages that the Commission and many families would consider to be acceptable for their families. For example, Comcast's limited basic service includes all local broadcast stations and public, educational, and government channels.³ (Of course, even broadcast stations carry some programming that may not be considered appropriate for younger viewers, and is appropriately labeled.) For consumers who want a more diverse programming lineup, the technologies described below empower parents to create their own customized tier of programming by using the "favorites" feature to select the channels they want and using parental controls to block the channels and programs they do not want.

Comcast, being the largest residential broadband provider in the United States, offers Comcast High Speed Internet ("HSI") customers access to an even wider array of video content online. To assist its customers in managing their families' experience online, Comcast offers the solutions described in more detail below.

II. COMCAST PROVIDES TOOLS TO GIVE PARENTS CONTROL OVER VIDEO CONTENT IN THEIR HOMES.

No matter how Comcast customers get their video, whether through Comcast's traditional cable service or over Comcast's HSI service, they have access to advanced parental controls that allow them to restrict their children's access to content they may find objectionable.

³ Comcast subscribers may also select a family tier that provides programming that is widely considered to be family-friendly. See Press Release, Comcast Corp., *Comcast Announces Family Tier* (Dec. 22, 2005), available at <http://www.comcast.com/About/PressRelease/PressReleaseDetail.aspx?PRID=101>. The family tier provides approximately 35–40 channels, including up to 16 family tier-specific channels and others from Comcast's limited basic service. See Comcast Corp., *Comcast Kids, Family Tier Programming Package*, at <http://comcastkids.ecityinteractive.com/factTier.aspx> (last visited Apr. 16, 2009).

A. Comcast Provides Tools for Parents To Control Cable Television Content.

Comcast empowers parents to block programming they may find objectionable on both digital and analog cable. For any Comcast customer, Comcast will block any channel upon request and for no charge. For Comcast subscribers who use the V-chip, the most widely deployed parental control technology, which of course allows for blocking of individual programs based on their rating, Comcast's systems are compatible with and support that technology.

For analog subscribers, depending on their local Comcast system, Comcast may use a signal trap or a set-top box to block programming that parents deem objectionable.⁴ Digital cable subscribers with two-way digital set-top boxes, or consumer electronics devices containing tru2way technology, have more numerous and versatile parental control options.⁵ These options include the ability to block programming by channel, by program title, and by rating (including both TV rating and MPAA rating).⁶ The controls similarly allow parents to block or limit access to Video-on-Demand ("VOD") content and to programs recorded using Comcast's digital video

⁴ A signal trap is an electronic filter that "traps" out a particular channel. The signal trap is physically installed on the cable equipment outside a customer's home and provides complete blocking of the specific channel until the signal trap is removed.

⁵ Comcast is working to steadily increase the number of homes that subscribe to its digital cable service. At the end of 2008, digital subscribers constituted 70.3% of Comcast's customer base. That percentage is expected to be closer to 78% by 2010 if the growth trend of the past two years continues. See Comcast Corp., *Pro Forma Cable Customer Metrics* (Feb. 18, 2009), available at http://media.corporate-ir.net/media_files/irol/11/118591/Earnings_4Q08/4Q08Trending.pdf.

⁶ See Attachment 1 for an overview of Comcast's cable television parental controls. The parental control features described herein are available to the majority of Comcast subscribers. A smaller portion of Comcast systems have parental control features that are substantially similar to what is described, but are differentiated in some respects (for example, blocking by time period is only available in some areas). Comcast is working toward common parental controls for all of its cable television subscribers.

recorder (“DVR”) service. The controls also allow parents to hide the titles of shows from appearing in the electronic program guide (“EPG”).

Comcast believes that ratings information provides a valuable tool for parents to determine whether content is appropriate for their families. Thus, Comcast requires by contract that all linear programming networks that it carries provide programming ratings. Consistent with the cable industry’s commitment to improve the TV ratings system, channels managed by Comcast, including PBS KIDS Sprout, G4, E!, Style, Golf Channel, Versus, and the Comcast SportsNets, utilize larger and more frequent ratings icons.

B. Comcast Empowers Parents To Control Content That Their Children Can Access Online.

In addition to offering powerful tools for parents to limit their children’s access to cable television programming, Comcast also empowers parents to protect their children online.⁷ Comcast has partnered with McAfee to offer parental controls that not only permit parents to filter out content they deem inappropriate, including websites that offer video programming, but also monitor Internet activity to help parents protect their children against online predators, identity theft, and exposure to unwanted content. Comcast offers the McAfee software to its HSI customers at no additional charge. Among other things, the McAfee parental controls allow parents to: (1) establish time limits for when their children may use the Internet, by day of the week and hour of the day; (2) block access to websites that parents may find objectionable, including preventing children from accidentally accessing sites containing material deemed

⁷ Press Release, Comcast Corp., *Comcast Launches Comprehensive Internet Security Solution To Help Keep Customers Safe Online* (Aug. 16, 2005), available at <http://www.comcast.com/about/pressrelease/pressreleasedetail.ashx?prid=132>.

objectionable by the parent; (3) limit access to content parents may find objectionable using image analysis, even on websites that may not be blocked; (4) restrict access to content parents may find objectionable using keyword filters; and (5) prevent online posting or release of information that parents designate as “private,” such as phone numbers and home addresses.⁸ In addition to the McAfee software, Comcast provides Comcast SafeSearch, a kid-safe Internet search tool, powered by Google.⁹ Comcast also offers an e-mail feature that enables parents to limit who their children may receive e-mail from (e.g., parents can create a specific list of individuals who are allowed to send e-mail to their children, thus blocking e-mail from spammers advertising material parents may find objectionable).

III. COMCAST INFORMS PARENTS ABOUT THE TOOLS AVAILABLE TO THEM AND PROMOTES RESOURCES ABOUT MEDIA LITERACY AND PROVIDING A SAFE MEDIA ENVIRONMENT IN THE HOME.

Comcast strives to inform its subscribers about the parental control options available to them. In the words of Comcast’s Chairman and CEO Brian Roberts: “We want every parent in America to know about parental controls.”¹⁰ Comcast provides information about its cable television parental controls in a variety of formats:

- Every new Comcast customer receives parental controls instructions in their Customer Welcome Kit.

⁸ See Comcast Corp., *Comcast.net Security*, at <http://www.comcast.net/Security/SecSuiteSSO/> (last visited Apr. 16, 2009).

⁹ See Comcast Corp., *FAQs, What Is Safe Search?*, at <http://www.comcast.com/customers/faq/FaqDetails.ashx?ID=2937&fss=safesearch> (last visited Apr. 16, 2009).

¹⁰ Jube Shiver Jr., *Cable Industry To Publicize Controls*, LA Times, Apr. 28, 2005, available at <http://articles.latimes.com/2005/apr/28/business/fi-cable28>; see also Ted Hearn, *Roberts Leads ‘Control’ Charge*, Multichannel News, May 1, 2005 (noting that “Roberts took center stage here last Wednesday to announce cable’s latest educational and technology-blocking solutions for parents”), available at http://www.multichannel.com/article/82371-Roberts_Leads_Control_Charge.php.

- On an annual basis, Comcast provides a prominent statement on bills to let customers know about parental control tools, directing them where to find more information.
- Comcast staffs a dedicated telephone hotline at 1-866-781-1888 between 9:00 a.m. and 11:00 p.m. (ET) to assist parents with parental control tools. The hotline number is promoted in Customer Welcome Kits as well as online.¹¹
- Comcast customers can learn about the parental control tools available to them online at <http://www.comcast.com/Corporate/Customers/ParentalControls.html/>.¹²
- A parental controls instructional video is available on Comcast's VOD service and on Comcast cable systems' instructional channels.
- In 2008 alone, Comcast aired more than 5.8 million public service announcement ("PSA") spots, valued at more than \$60 million, to help educate parents about parental controls.¹³

As an additional tool for parents, Comcast and Common Sense Media entered into a multi-year commitment to make detailed, age-based information about television shows, movies, websites, video games, and books available to Comcast subscribers. Pursuant to that

¹¹ See Comcast Corp. *Parental Controls*, at <http://www.comcast.com/Corporate/Customers/ParentalControls.html/> (last visited Apr. 16, 2009).

¹² See *id.*

¹³ The cable industry, including Comcast, has made significant commitments in recent years to run PSAs to help educate parents about parental controls. See, e.g., Press Release, Nat'l Cable & Telecomm. Ass'n ("NCTA"), *U.S. Cable Industry Launches "Take Control. It's Easy" Campaign to Help Parents Manage Their Family's TV Viewing* (Apr. 27, 2005) ("To alert cable customers to the parental control features available to them, the cable industry has pledged to feature PSAs in air time valued at \$250 million over the next 12 months, in markets nationwide and during all TV viewing periods."), available at <http://www.ncta.com/ReleaseType/MediaRelease/369.aspx>. Beginning in August of 2006, the industry committed to running the Ad Council's "TV Boss" parental control PSAs. See Press Release, NCTA, *Media and Entertainment Industries Unite in Unprecedented Effort to Help Parents Monitor Kids' TV* (July 25, 2006) ("The new PSAs are being distributed to media outlets nationwide this month and will appear in advertising time and space donated by the media. The media company campaign partners have committed to donate an unprecedented \$300 million in advertising time and space for the new PSAs during the next eighteen months."), available at <http://www.ncta.com/ReleaseType/MediaRelease/3482.aspx>. During 2008, Comcast led the cable industry in terms of the number of spots aired and their overall value.

commitment, Comcast makes dozens of Common Sense Media's reviews of movies and television programs available on its VOD service and on Comcast.net.¹⁴

Comcast provides a wealth of information to consumers about keeping children safe online at the Comcast.net Security Channel. The website, available at <http://www.comcast.net/security/>, includes information about the McAfee software, educational materials about staying protected from security threats, steps to take to report child endangerment, and links to important additional information about keeping families safe online.¹⁵

As noted in the recent report *Parental Controls and Online Child Protection: A Survey of Tools and Methods*, Comcast participates in multiple efforts to educate parents and to protect children.¹⁶ For example, Comcast has a partnership with iKeepSafe, a coalition of 49 state governors and first spouses, law enforcement officials, the American Medical Association, the American Academy of Pediatrics, and other corporations and private associations that provides

¹⁴ See Press Release, Comcast Corp., *Common Sense Media: Comcast and Common Sense Media Announce Partnership To Provide Cross-Platform Media Education Tools for Parents* (Feb. 5, 2007) (Common Sense Media, a "non-partisan organization dedicated to kids and media, provides independent, age-based reviews and ratings on movies, television shows, books, video games, websites and music so families can determine whether the selection is right for them."), available at <http://www.comcast.com/About/PressRelease/PressReleaseDetail.ashx?PRID=13&fss=parents>. Common Sense Media's informational programs on media topics of concern to families, such as Internet Safety, are also available.

¹⁵ See Press Release, Comcast Corp., *Comcast Launches Comprehensive Internet Security Solution To Help Keep Customers Safe Online* (Aug. 16, 2005) available at <http://www.comcast.com/About/PressRelease/PressReleaseDetail.ashx?PRID=132&fss=security>.

¹⁶ See Adam Thierer, *Parental Controls and Online Child Protection: A Survey of Tools and Methods*, Version 3.1, Fall 2008, at 94, 96, 136 (noting that Comcast is, among other things, a supporter of GetNetWise.org (www.getnetwise.org), a public service website operated by the nonprofit Internet Education Foundation, and a coalition member of Project Online Safety (www.projectonlinesafety.com), an online portal offering a directory of online safety tools and educational materials developed by technology companies, media organizations and nonprofits), available at <http://www.pff.org/parentalcontrols/Parental%20Controls%20&%20Online%20Child%20Protection%20%5BVERS%20ION%203.1%5D.pdf>. See Attachment 2 for an overview of Comcast's online safety efforts.

tools and guidelines to teach children the safe and healthy use of technology.¹⁷ Comcast is also at the forefront in working with the inter-industry coalition, PointSmart.ClickSafe., to identify “best practices” among Internet service and online content providers.¹⁸ Most recently, Jay Opperman, Comcast’s Director of Online Security, was named to the National Telecommunications and Information Administration’s Online Safety and Technology Working Group.¹⁹

Comcast is also a member of the Family Online Safety Institute (“FOSI”), an international, non-profit membership organization dedicated to working to develop a safer Internet, and an executive of the company serves on FOSI’s board.²⁰ Comcast showcased its Internet Safety initiatives at FOSI’s Washington conferences in 2007 and 2008, was a leading sponsor of FOSI’s 2008 conference, and has participated in numerous FOSI events, including an event focused exclusively on wireless safety to be held on April 22, 2009.²¹ In December 2008,

¹⁷ See, e.g., Press Release, Commonwealth of Va., Office of the Attorney Gen., *Attorney General McDonnell, Comcast, iKeepSafe Unveil Internet Safety Video Available ‘On Demand’* (July 8, 2008) (reporting that Attorney General McDonnell, Comcast, and iKeepSafe unveiled a new video teaching children and parents about online safety that will be available via Comcast’s VOD service), available at http://www.oag.state.va.us/PRESS_RELEASES/NewsArchive/070808_iKeepSafe_Video.html; Press Release, Wash. State Office of the Attorney Gen., *iKeepSafe Honors Washington Attorney General McKenna with the Internet Keep Safe Award* (June 11, 2008) (announcing that iKeepSafe and Comcast are “bringing the ‘Faux Paw the Techno Cat®’ Internet safety program to a local elementary school and that students will participate in a special program with Attorney General McKenna, hosted by iKeepSafe and Comcast, to learn how to have a safe and healthy experience with connected technology”), available at <http://www.atg.wa.gov/pressrelease.aspx?id=19936>.

¹⁸ See *PointSmart.ClickSafe.*, at <http://www.pointsmartclicksafe.org/flash.html> (last visited Apr. 16, 2009).

¹⁹ See *Morris, Thierer Named To Web Safety Panel*, Nat’l J. Tech Daily Dose, Apr. 6, 2009, at <http://techdailydose.nationaljournal.com/2009/04/morris-thierer-named-to-web-sa.php#more> (last visited Apr. 16, 2009).

²⁰ See FOSI, *Membership Working To Develop a Safer Internet*, at <http://www.fosi.org/cms/index.php/abouttheinstitute.html> (last visited Apr. 16, 2009).

²¹ See FOSI, *Agenda - Keeping Kids Safe in a Mobile Environment*, at <http://www.fosi.org/cms/index.php/events/348-agenda-kidssafe.html> (last visited Apr. 16, 2009).

Mitch Bowling, Senior Vice President and General Manager of Comcast.net, received FOSI's Award for Outstanding Achievement for his commitment to advancing the goal of a safer Internet.²²

* * *

Comcast regularly surveys its subscribers to confirm that it is providing the parental control technologies they demand.²³ These surveys demonstrate that Comcast is offering the parental controls demanded by subscribers and that subscribers are very satisfied with the level of functionality provided. Nevertheless, Comcast is constantly exploring better and more innovative ways to empower parents to control their children's exposure to content they may find objectionable.²⁴

²² Press Release, Comcast Corp., *Comcast's Mitch Bowling Receives Award For Outstanding Achievement from the Family Online Safety Institute* (Dec. 11, 2008) ("Bowling was chosen to receive this award based on his tireless commitment to advancing the goal of a safer Internet," said Stephen Balkam, CEO of FOSI. "It's wonderful to see Comcast's online services being led by an individual who is truly passionate about educating consumers about how to keep safe on the Internet."'), available at <http://www.comcast.com/About/PressRelease/PressReleaseDetail.ashx?PRID=830&fss=fosi>.

²³ Comcast routinely studies the level of customer satisfaction related to its parental controls. A recent Usage and Satisfaction study by Frank N. Magid Associates, Inc. demonstrates that Comcast subscribers who use the parental control tools are very satisfied with them. In fact, the study found that 75% of subscribers who use the parental controls gave them a rating of 7, 8, 9, or 10, on a 10-point scale.

²⁴ See, e.g., Attachment 1 at 17 (describing new parental control features that Comcast is currently exploring).

IV. CONCLUSION.

Although the parental control tools Comcast currently offers allow parents to control their children's exposure to content they may find objectionable almost as effectively as a parent pushing the "off" button, Comcast will continue its efforts to bring its customers the latest parental control technologies for their cable and Internet services.

Respectfully submitted,

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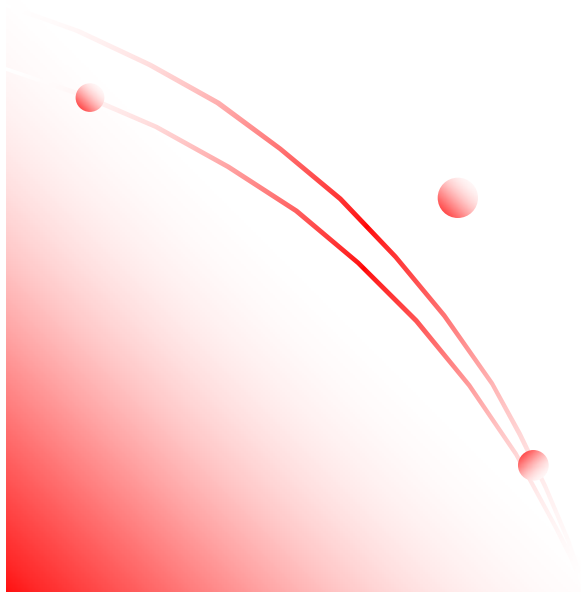
Attorneys for Comcast Corporation

April 16, 2009

ATTACHMENT 1



Comcast Parental Controls Overview



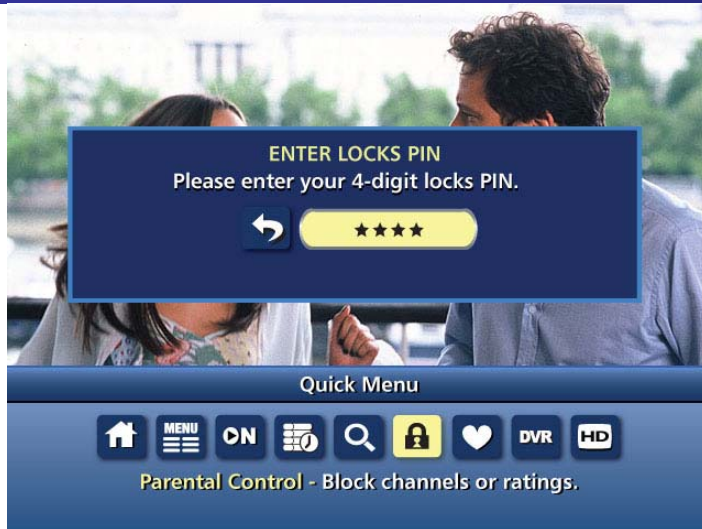
Parental Control Functionality in customer homes today...

1. PIN Setup for Parental Locks and Purchasing
2. Type of Locks supported
 - Lock by TV Rating
 - Lock by Movie Rating (MPAA)
 - Lock by Content Type (TV only)
 - Lock by Channel
 - Lock by Title of program
 - Service Locks (VOD)
3. Master Locks
4. Hide Adult Titles





Access Parental Controls from Quick Menu or Main Menu



Quick Menu



Main Menu



Parental Control Menu



Accessing Parental Controls from Program Info or Live TV



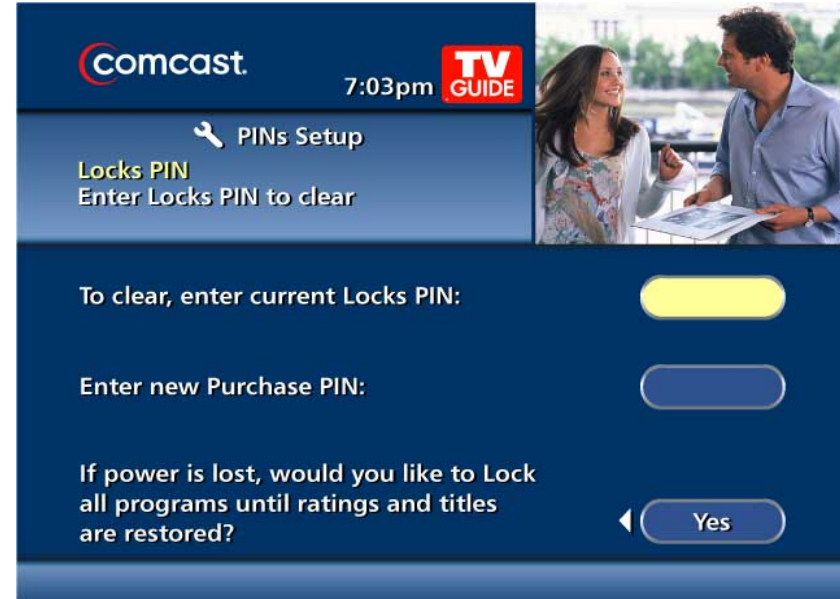
Program Info



Pressing "Lock" on remote while watching TV

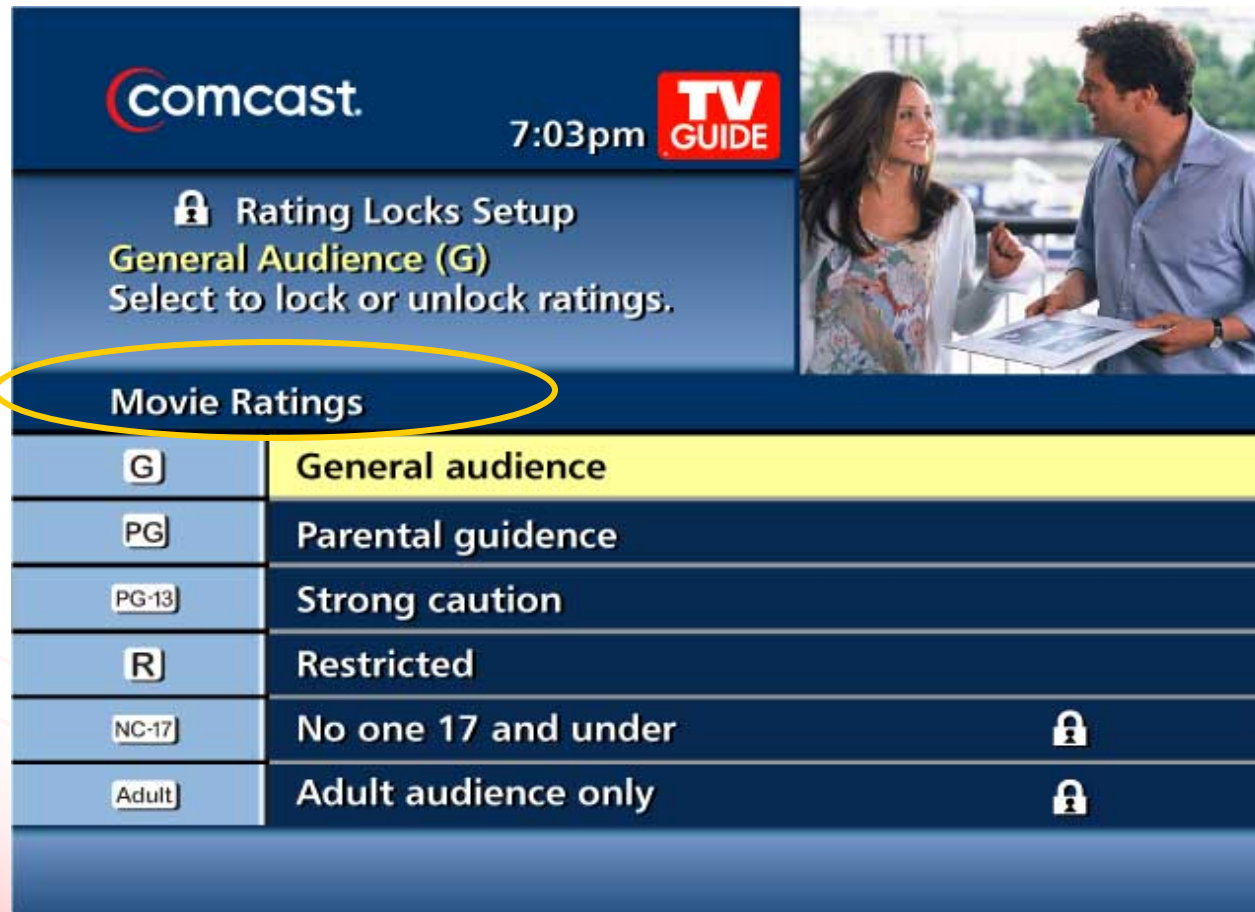


Lock Options Overlay



Setup Menu for Parental Locks Pin and Purchase Pin

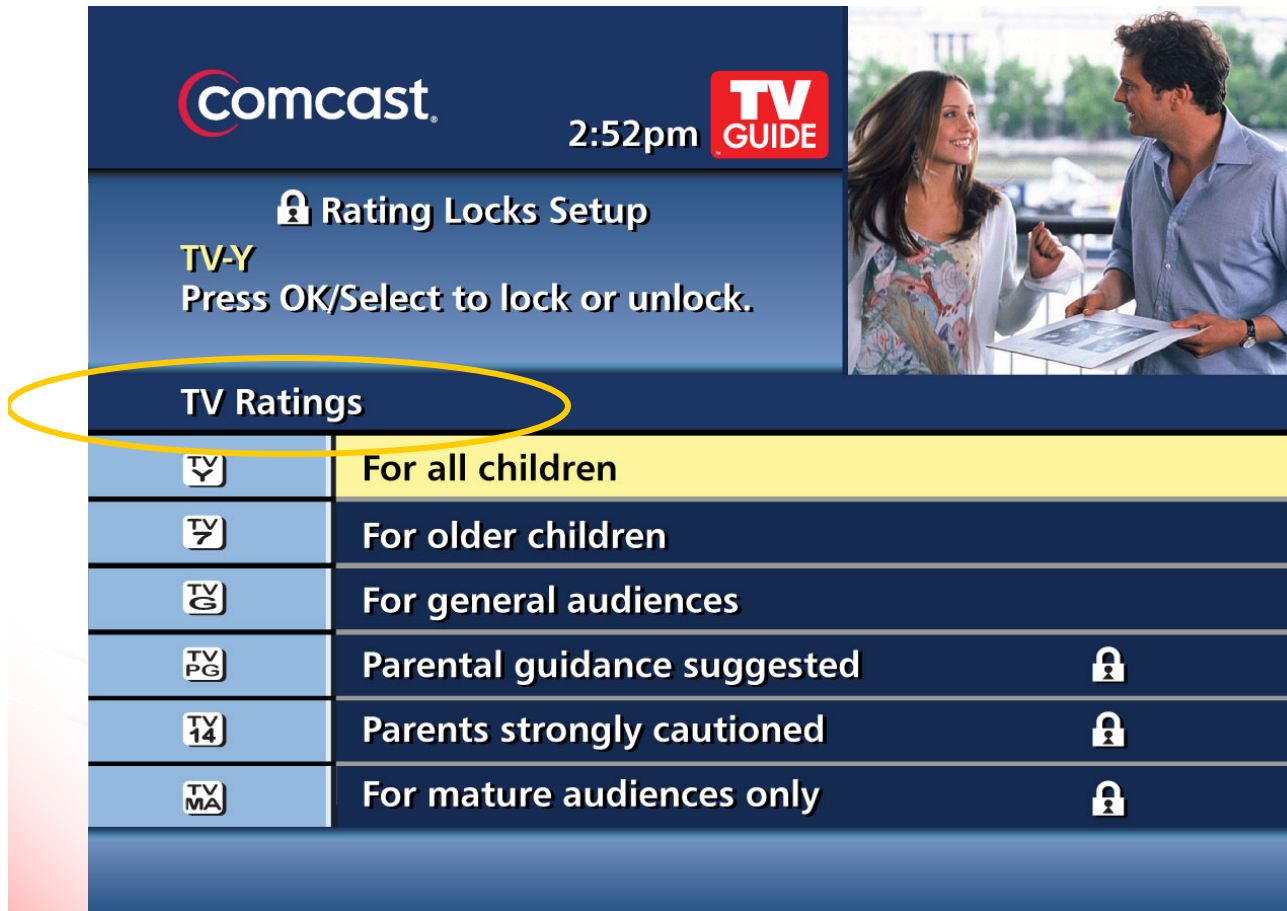
- **Clear PIN** – allows customers to easily change their PIN at anytime
- **New PIN** – customers can establish a new PIN for Locks or Purchasing
- **Power loss Lock** – if power is lost this will lock all content until guide data is restored



Improved Locks w/ listing style screens

1. User can see all movie ratings and lock status
2. “Ratings Ceiling” – automatically enforces ratings at the currently selected severity and any more severe content

Example: Customer has selected NC-17 to lock, the guide automatically locked Adult content



Improved Locks w/ listing style screens

1. User can see all movie ratings and lock status
2. “Ratings Ceiling”

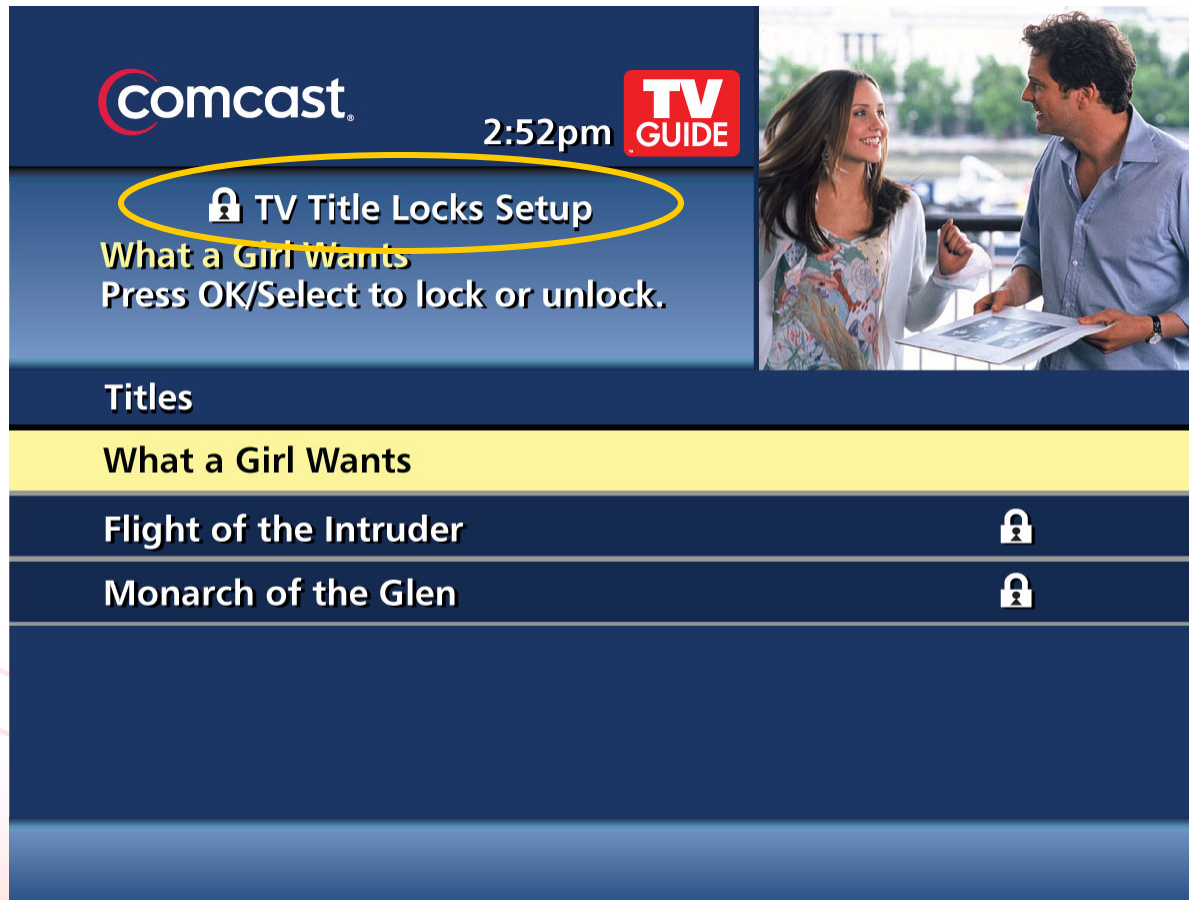
Example: Customer has selected TVPG to lock, the guide automatically locked both TV14 and TVMA content



Improved Locks w/ listing style screens

1. User can sort channels by number or channel name
2. User simply presses "OK" on the remote to lock or unlock a channel

Example: Customer has selected to lock USA, VH1 and Comedy Central



Improved Locks w/ listing style screens

1. User can see all titles that are locked
2. User simply presses "OK" on the remote to unlock a title or to re-lock
3. Anytime programs with these titles air, they will be locked regardless of their rating or channel

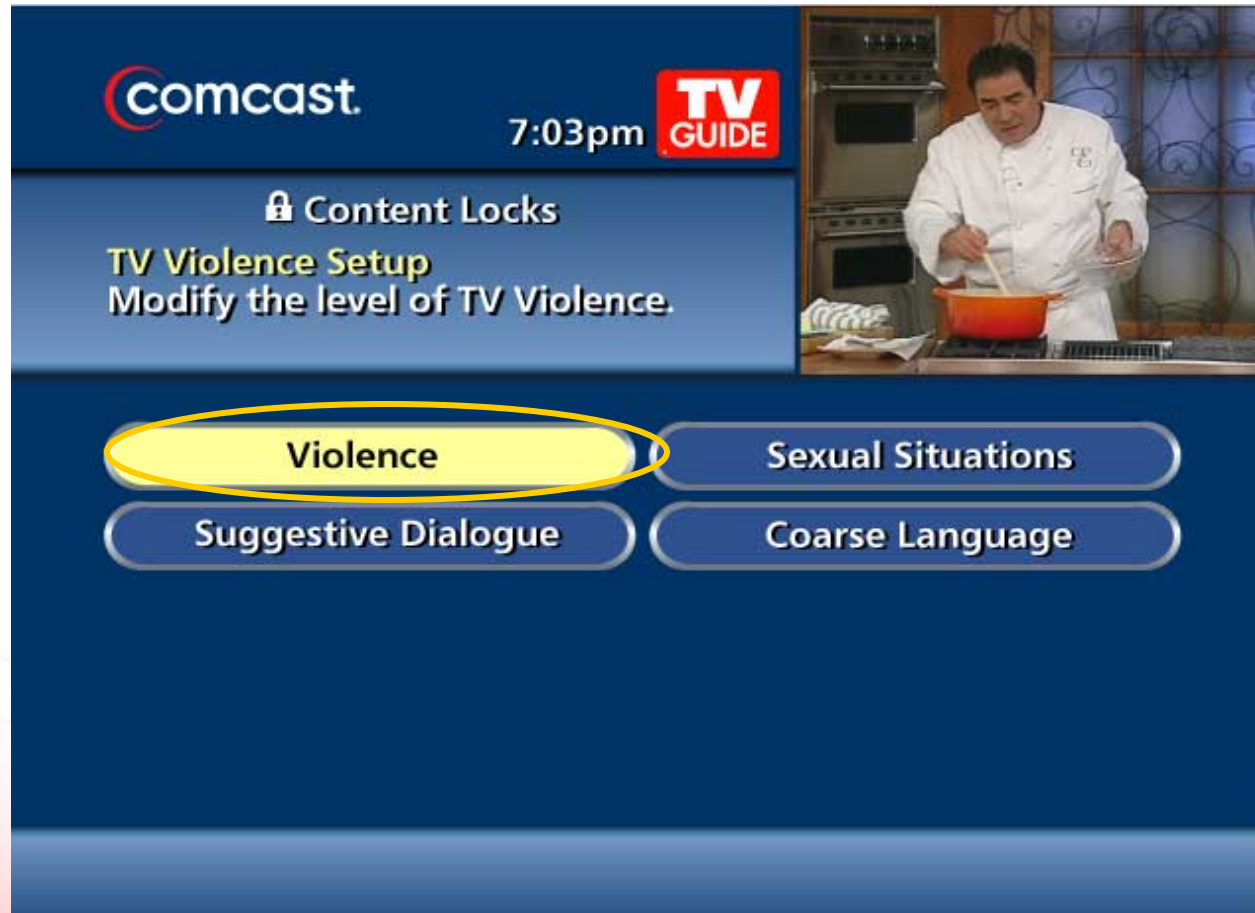
Example: Customer has selected to lock "Flight of the Intruder" and "Monarch of the Glen"



Content Locks

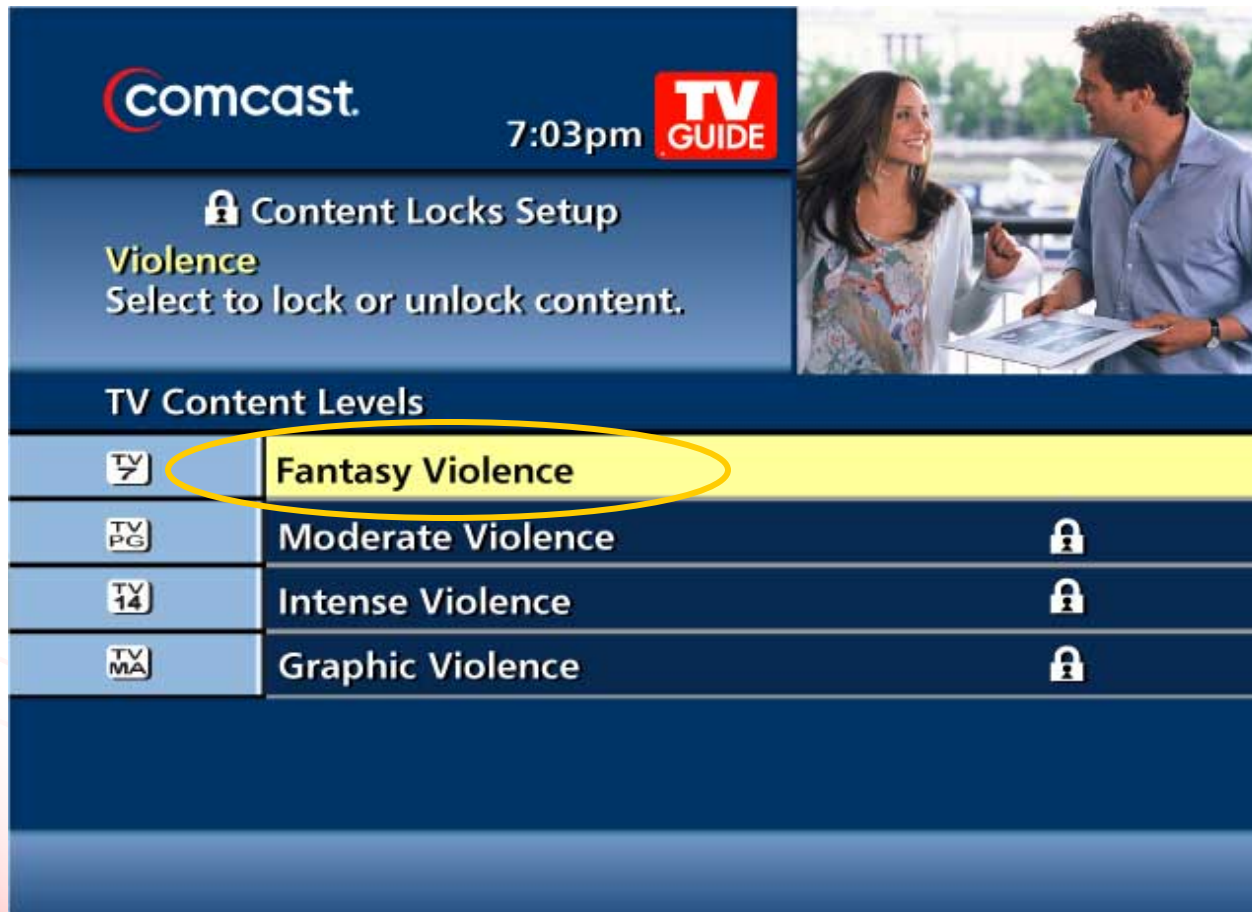
1. Content Locks can be used to block portions of unlocked TV Ratings.
2. Locking a rating automatically locks all content associated with that rating. There is no need to apply both content and rating locks. Content locks allow users to set more granular locks and just lock portions of ratings.

Example: A customer locks TVPG “sexual situations” but not TVPG “violence”



Content Locks

1. Users choose to lock specific TV content, Example "violence"



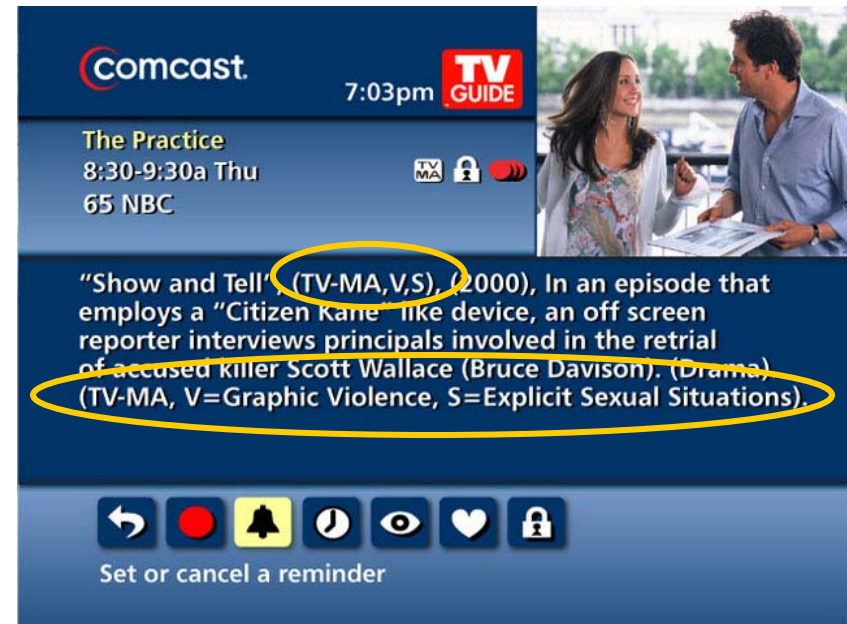
Content Locks

1. Lock a specific level of TV Violence
2. “Rating Ceiling”

Example: Customer has selected to lock Moderate Violence and the guide automatically locked Intense and Graphic Violence

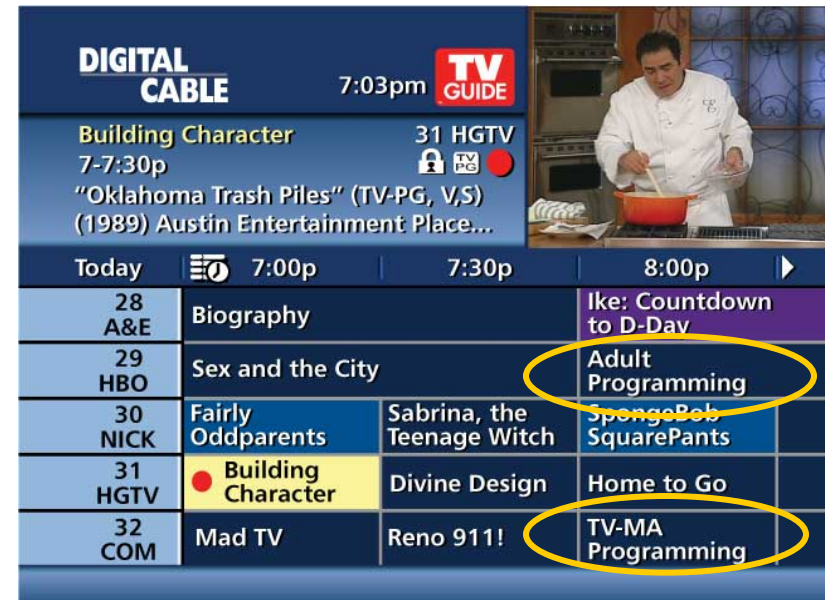
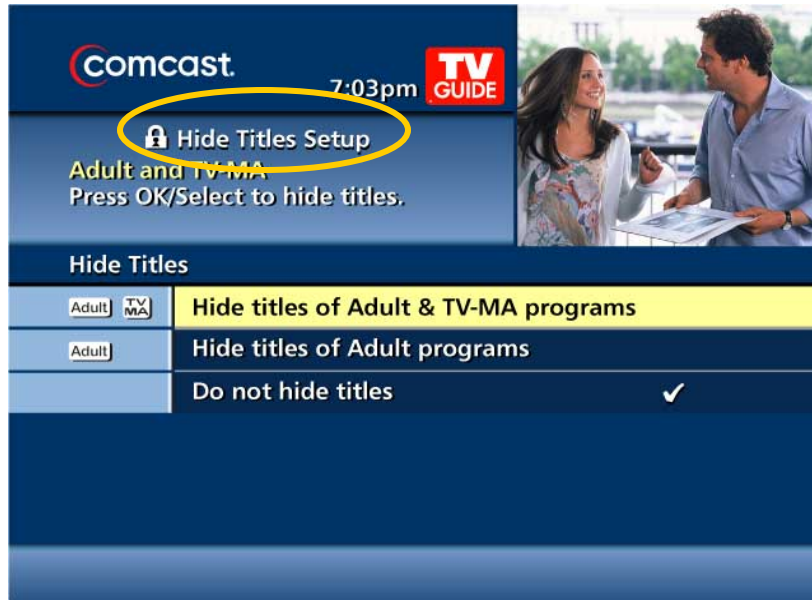


Content Labels are displayed in the TV Listings grid



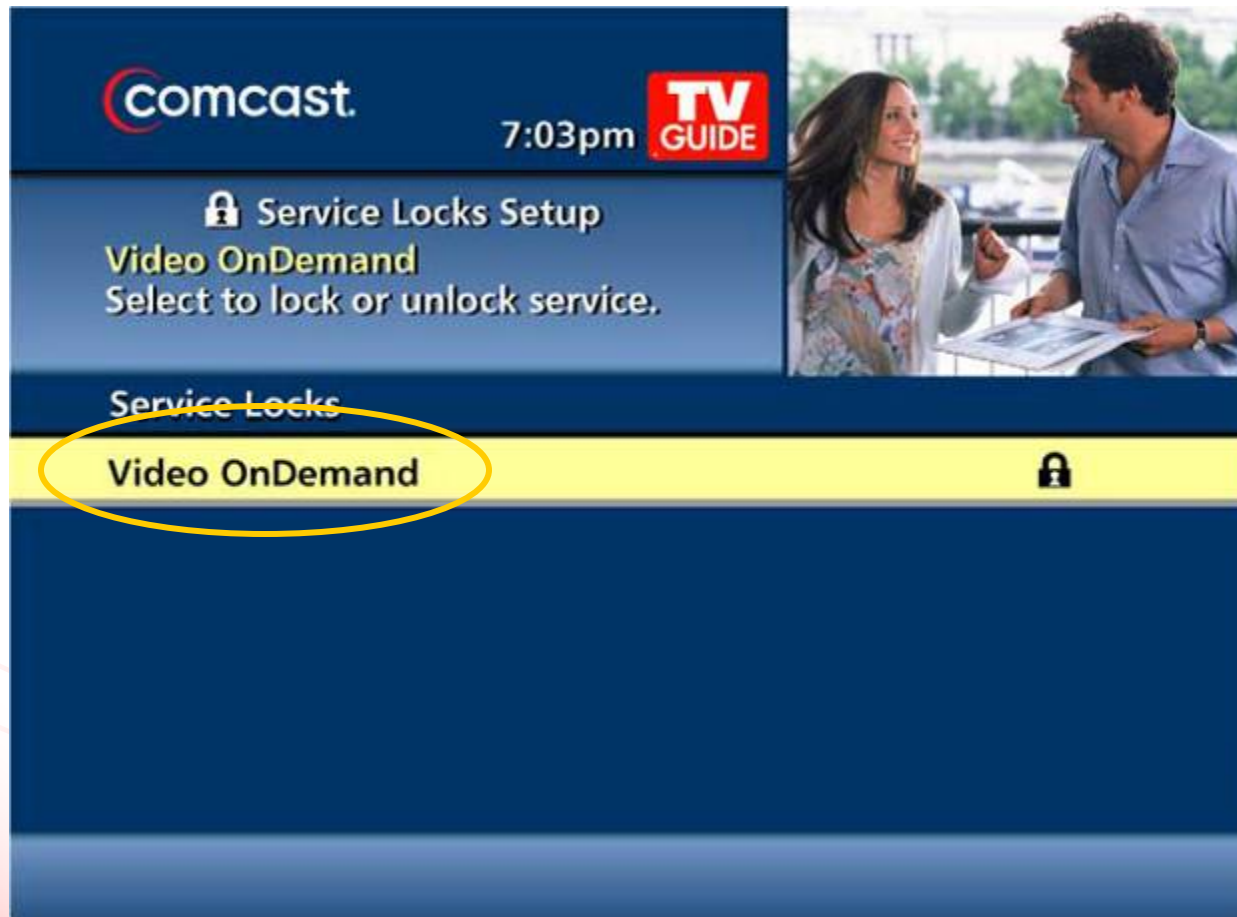
Enhanced ability to view program rating information and content descriptions

- Instant info area
 - TV Rating
 - Content Labels (V, S, D, L)
- Full Info
 - TV Rating
 - Content Label
 - Description of Label



Hide Titles – Three Settings

1. Hide Adult & TV-MA – actual titles are replaced with “Adult Programming” or “TV-MA programming”
2. Hide Adult Titles Only
3. Do not hide titles

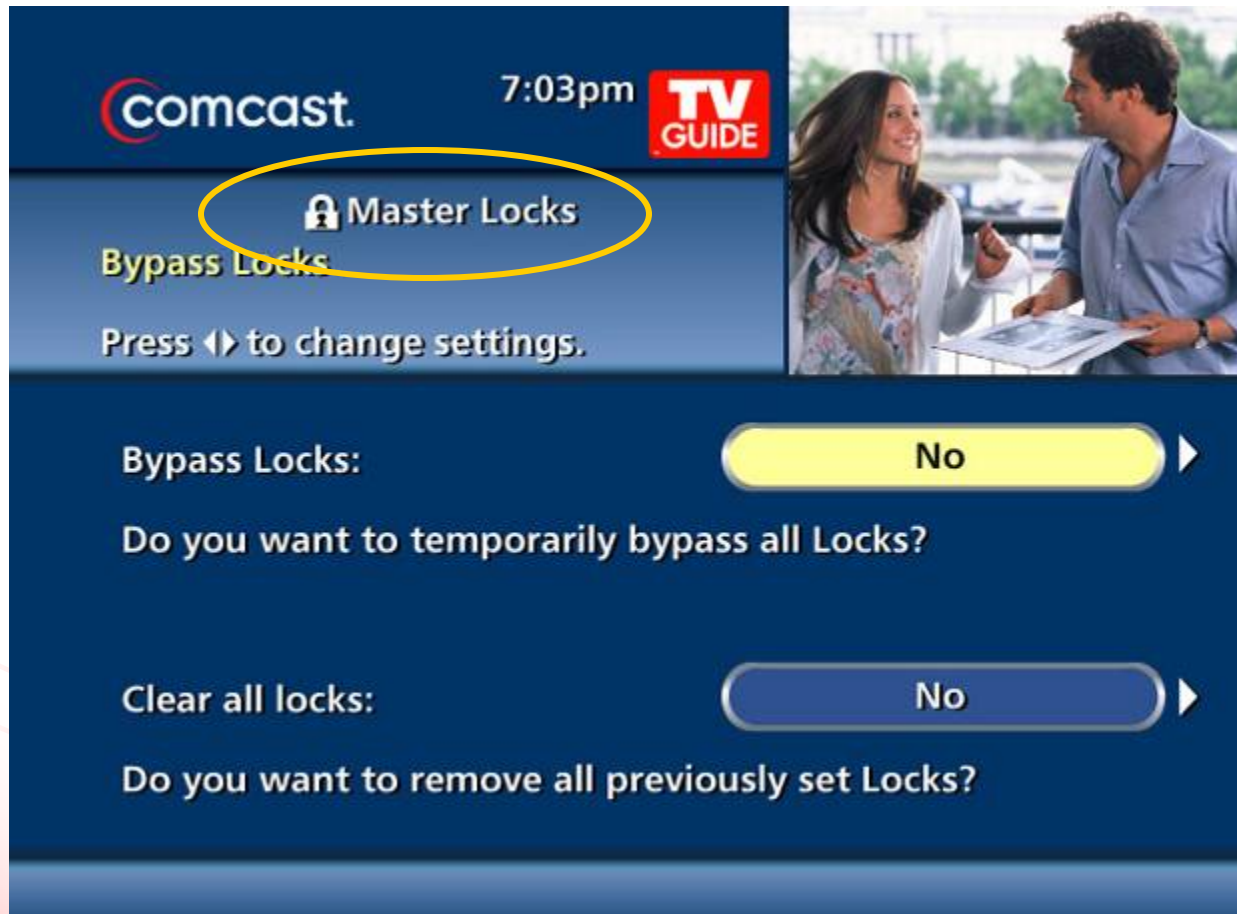


Service Locks

1. Allows customers to lock access to On Demand as a feature

Example: Customer has selected to lock On Demand. Anytime the On Demand button on the remote is pressed, the user will be prompted to enter a PIN before being allowed to access On Demand.

Please Note: On Demand programs may also be blocked using TV and Movie Ratings settings.



Master Locks

1. **Bypass Locks** – users can temporarily turn off all locks. Turning off the STB will restore the locks.
2. **Clear All** – allows customers to clear all previously set locks

Comcast Continues To Explore New Ways To Empower Parents



1. Comcast is experimenting with a “Parental Control Dashboard” that would enable parents to see all currently set locks via a summary screen.
2. Comcast is also exploring implementation of an “EZ Setup Wizard” that would provide step-by-step guidance to engage parental controls.

ATTACHMENT 2



Online Safety Overview



Comcast is committed to providing the tools and safeguards to help keep all of our users safe online, particularly our youngest ones. We participate in three key areas of online children's safety, including:

- ✓ **Parental Controls** - Internet controls that enable parents to monitor and filter their family's online activity.
- ✓ **Customer Awareness and Education** –In-depth information to increase awareness and prevention of the latest online threats.
- ✓ **Law Enforcement Partnership** - Comcast partners with key industry and law enforcement leaders to develop and maintain the highest standards in online children's safety.

Comcast Customer Awareness & Education

Security Resources: Comcast partners with key Industry leaders to offer the latest information in online safety through Comcast.net.

OnGuard Online
YOUR SAFETY NET™



DETER·DETECT·DEFEND
AVOID THEFT



GetNetWise

common sense
media


project online safety

iKeepSafe
with Comcast

 **staysafe.org** Online Safety & Security Is All About You.

Did You Know?

- ✓ Comcast Security Professionals participate in many Industry-led community forums related to online safety throughout the country!

Comcast airs PSAs on Online Safety sponsored by NCMEC and the AdCouncil.



Comcast partners with federal and local law enforcement agencies (LEA) to provide quality service where it matters the most:

- ✓ The Comcast Legal Response Center is a fully staffed group of dedicated professionals who research and respond to High Speed Internet legal requests (court orders, subpoenas, etc.).
- ✓ Comcast maintains a good working relationship with LEAs at the national and local level.

Did You Know?

- ✓ In November, 2006 80% of the after hours emergency law enforcement support was related to a missing or exploited child incidents.



Active Member, HTCIA

Child Protection: Comcast prioritizes the investigation and handling of child exploitation incidents.

- ✓ Comcast has established a special alerting process with law enforcement to quickly aid in the investigation of crimes against children (e.g., child pornography, missing child, etc.)

Did You Know?

- ✓ Comcast reports incidents of child exploitation images to the National Center for Missing and Exploited Children's CyberTipLine.



**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)	
)	
Implementation of the Child Safe Viewing Act;)	MB Docket No. 09-26
Examination of Parental Control Technologies)	
for Video or Audio Programming)	
)	

REPLY COMMENTS OF COMCAST CORPORATION

Comcast Corporation (“Comcast”) hereby responds to the comments filed in response to the above-captioned Notice of Inquiry (“*Notice*”).¹ As explained in our comments, Comcast empowers parents to limit access to content they deem inappropriate for their children by providing its customers a wide-range of parental control options.² Comcast also educates parents about the tools that are available to them.³

¹ *In re Implementation of the Child Safe Viewing Act; Examination of Parental Control Technologies for Video or Audio Programming*, Notice of Inquiry, 24 FCC Rcd. 3342 (2009) (“*Notice*”).

² *See* Comcast Comments at 1, 2-5.

³ *See id.* 5-9. Comcast’s comments included a reference to Project Online Safety, *see id.* at 7 n.16, which has been superseded by various other efforts. Comcast’s Security Channel (security.comcast.net) offers links to a wide variety of resources that provide information to help parents stay educated about online safety issues. For example, Comcast provides links to the Family Online Safety Institute (“FOSI”) website (a resource providing materials online to help families have a safe experience online); Pointsmartclicksafe.org (a website containing information about the cable industry initiative to educate parents about online safety and appropriate use of the Internet by their children); www.getnetwise.org (a comprehensive website for information to help keep families safe online); Netsmartz.org (an interactive, educational safety resource from the National Center for Missing and Exploited Children (“NCMEC”) and Boys & Girls Clubs of America); Microsoft Online Safety (a website containing advice and tools to help protect families from inappropriate content, inappropriate contact, viruses, identity theft, and more); OnGuardOnline.gov (a website providing practical tips from the federal government and the technology industry against victimization); and Common Sense Media (a website offering resources dedicated to making age-appropriate media decisions easier).

The comments filed in this proceeding demonstrate that there are an abundance of parental control tools available in the marketplace today.⁴ As noted by the Association of National Advertisers, a “quick inventory of available technologies reveals a diverse array of methods that permit viewers to exert control over the programming they receive.”⁵ Comcast agrees with commenters who oppose government mandates for parental controls, given that the marketplace is meeting consumer demand and that government mandates could harm innovation and limit options available to parents.⁶ A joint comment by NAB, NCTA, and MPAA aptly explains,

Clearly, there is a marketplace demand for parental control technology, and a broad array of companies is [sic] developing innovative products to meet that demand. However, governmental intervention, in the form of a mandatory ratings system or technology mandates, would likely chill innovation and investment in new solutions and limit parental options for managing their children’s TV viewing.⁷

⁴ A wide variety of companies provided descriptions of the parental control technologies that they provide to consumers. *See, e.g.*, Cox Comments at 1-2, 5-11; AT&T Comments at 5-9; DirecTV Comments at 2-11; Sprint Comments at 1-3; Google Comments at 4-9; Microsoft Comments at 5-16; TiVo Comments at 2-4.

⁵ Ass’n of Nat’l Advertisers Comments at 2; *see also* Progress & Freedom Found. Comments at iii (“There has never been a time in our nation’s history when parents have had more tools and methods at their disposal Parents have been empowered with technologies, strategies, and information that can help them devise and enforce a media plan for their families that is in line with their own needs and values.”); NAB/NCTA/MPAA Joint Comments at 3 (“[T]here are a number of parental control technologies currently available and additional tools are coming to market for a variety of video platforms.”); DISH Network Comments at 2 (“The industry has demonstrated that if afforded adequate flexibility, it can create a wide variety of tools for parental empowerment to manage children’s viewing.”); AT&T Comments at 5 (“Internet service providers, communications companies, entertainment and video service providers, and others already have deployed a broad array of parental control technologies to help parents keep children safe online.”); Consumer Elecs. Ass’n Comments at 5 (“More than ever before, today’s parents have a multitude of advanced blocking technology options to identify objectionable content and prevent their children from accessing that content.”).

⁶ *See, e.g.*, Progress & Freedom Found. Comments at 6-7; Verizon Comments at 11-12; TiVo Comments at 7.

⁷ NAB/NCTA/MPAA Joint Comments at 18.

Other parties offered similar insights:

- Government controls . . . essentially treat all households as having the same needs and values Even though not all private controls will be equally effective, failure will be detected more rapidly and the better systems will gradually win out as more and more legitimate content is tagged and rated.⁸
- Given the exceedingly fast evolution of communications technologies and the marketplace, the development of an extensive federal regulatory regime could hinder . . . development of advanced parental control technologies. . . . [A]ny lengthy regulatory process aimed at mandating standardized parental control requirements could work to delay . . . the development of advanced, state-of-the-art content filtering or blocking mechanisms. Moreover, any regulatory efforts to arrive at a ‘one-size-fits-all’ approach to parental control technologies very well could result in adoption of a lowest common denominator approach that would discourage carrier innovation, inhibit the development of alternatives, and ultimately leave parents with fewer, less effective tools at their disposal.⁹
- [I]f Congress or the Commission chooses a particular technological implementation over other technically feasible alternatives, innovation will be choked off.¹⁰

Despite the strong consensus reflected in the comments just cited, and the powerful logic on which they rely, TV Guardian urges the Commission to suggest that Congress mandate widespread use of its technology, including in hundreds of millions of cable set-top boxes.¹¹ The Commission should not do so. TV Guardian acknowledges that its technology has been incorporated into certain consumer electronics devices that consumers interested in the technology can buy. There is no need to mandate that it be incorporated into set-top boxes, which -- contrary to TV Guardian’s claims -- is neither easy nor inexpensive. As TiVo explains, it is “doubt[ful] that [TV Guardian] would work well nationwide across a wide variety of close

⁸ Progress & Freedom Found. Comments at 6-7.

⁹ Verizon Comments at 11-12 .

¹⁰ TiVo Comments at 7.

¹¹ See TV Guardian Comments at 42.

captioned video programs,” thus, TiVo “opposes mandates of particular technology implementations without a thorough cost/benefit analysis and an understanding of all intellectual property issues.”¹² Comcast agrees.

Comcast did in fact meet with TV Guardian several times to discuss its technology.¹³ Comcast continually evaluates new product features from both internal and external resources, and did so with TV Guardian.¹⁴ Cognizant of potential legal and technical issues related to deployment, Comcast commissioned research to explore potential consumer demand for the TV Guardian technology.¹⁵ The research indicated that the breadth of the technology’s actual usefulness to the Comcast customer base would be quite limited. Coupled with the potential legal and technical concerns related to deployment of TV Guardian, Comcast’s research showed that TV Guardian’s technology would not garner sufficient consumer interest and incorporation of that technology into Comcast’s set-top boxes would not be a good business decision. Despite TV Guardian’s urging, the Commission has no basis, and no authority, to disturb that reasonable and well-grounded business judgment.

¹² TiVo Comments at 9, n.4.

¹³ Comcast and TV Guardian had numerous face-to-face meetings and conference calls, representing a typical level of engagement for Comcast’s investigation and evaluation of new technologies or services. In fact, the evaluation of TV Guardian ultimately proceeded further than most due to the fact that Comcast places a great deal of importance and priority on the area of parental controls.

¹⁴ New product features are always evaluated against three main criteria: value to the consumer, technical feasibility, and cost to build, integrate, and license.

¹⁵ To explore value to the consumer, Comcast typically performs attitudinal research to determine applicability to a broad spectrum of potential users. In those instances, Comcast tests for general acceptance of the product or service as designed and, in certain cases, early stage usability testing. The end user experience also is evaluated; this includes performance, presentation quality, interaction model, nomenclature, and additive or subtractive value of the feature in relationship to the primary goal of video consumption and management. Finally, Comcast explores the price/value relationship.

For the foregoing reasons, Comcast requests that the Commission issue a report in this proceeding that illustrates the breadth and depth of parental control options available in the marketplace today, and opposes any government mandates that could have unintended negative consequences.

Respectfully submitted,

/s/ James L. Casserly

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May 18, 2009